

AM JAMES BONINI
CLERK
FILED
04 APR 28 PM 3:29

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DISTRICT

CASE NO. C-1-01-714

UNITED STATES OF AMERICA

JUDGE WEBER

v.

GEORGE J. FIORINI, II

STATEMENT OF FACTS

Affidavit of George J. Fiorini, II

Being duly sworn, affiant states:

CLAIM, FOR THE TRUTH OF THE OATH IS WITH THE CLAIM OF THE FACTS

Isn't it true that George J. Fiorini, II (hereafter referred to as Mr. Fiorini) OBJECTS to the Plaintiff's claim of an additional superceding indictment, Count 83, referring to Interstate Transportation of Stolen Property?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini is Innocent of the charges specified under Count 83?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini has never intended to or has knowingly or with intent, stolen any property or transported any stolen property, knowingly or with intent by means of interstate transportation?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini OBJECTS to the Plaintiff's claim of an additional superceding indictment, Count 84, referring to Interstate Transportation of Stolen Property?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini is Innocent of the charges specified under Count 84?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini OBJECTS to the Plaintiff's claim of an additional superceding indictment, Count 85, referring to Wire Fraud?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini is Innocent of the charges specified under Count 85?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini OBJECTS to the Plaintiff's claim of an additional superceding indictment, Count 86, referring to Wire Fraud?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini is Innocent of the charges specified under Count 86?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini OBJECTS to the Plaintiff's claim of an additional superceding indictment, Count 87, referring to Wire Fraud?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini is Innocent of the charges specified under Count 87?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini OBJECTS to the Plaintiff's claim of an additional superceding indictment, Count 88, referring to Wire Fraud?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini Is Innocent of the charges specified under Count 88?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini has never knowingly or with intent violated any law that would or could be specified as "Wire Fraud"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini receive a Summons to appear before the Grand Jury for the purpose of giving his testimony to the Grand Jury?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini told his court appointed attorney, Kelly Johnson, that Yes, indeed, he wanted to testify in front of the Grand Jury?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini was anxious to testify in front of the Grand Jury for the express purpose of proving to them that he was not guilty of any wrongdoing and was in fact INNOCENT of all charges?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that attorney, Kelly Johnson, repeatedly expressed to Mr. Fiorini that he would be indicted by the Grand Jury prior to the date of the Grand Jury hearing?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini was repeatedly harassed by attorney, Kelly Johnson, whose threats of punishments were for the purpose of coercing Mr. Fiorini to not testify in front of the Grand Jury as Mr. Fiorini was desirous of and subpoenaed to come forth and do so?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini presented documents to his attorney, Kelly Johnson that would prove his innocence of all counts claimed against him and asked to present them to the Grand Jury along with his testimony?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that attorney Kelly Johnson reviewed the documents?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that attorney Kelly Johnson's posture, demeanor and verbiage acknowledged and validated information contained in the documents provided to him by Mr. Fiorini which were provided for the express purpose of proving the INNONCENCE of FIORINI and answering any and all questions that Judge Weber had specifically requested?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Kelly Johnson asked Mr. Fiorini again to not testify the facts and truths to the Grand Jury as he was subpoenaed to come forth and do so?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Kelly Johnson continued to inflict mental, emotional and physical stress and harm upon Mr. Fiorini in attempt to persuade Mr. Fiorini from wanting to give his truthful testimony, under oath, before the Grand Jury?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini continued to assert to his court appointed attorney, Kelly Johnson, that despite Johnson's abusive behavior, Mr. Fiorini did in fact want to testify to the court and the Grand Jury to bring truth and light to the matter at hand?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Kelly Johnson asked Mr. Fiorini to sign a paper that inferred that Johnson was not responsible for Mr. Fiorini's testimony if in fact Mr. Fiorini did go forth and testify as to the truth in front of the Grand Jury as he was summoned to go forth and do so?

If no answer is forthcoming, the default answer is yes it is so.

Isn't it true that Mr. Fiorini signed that document "under Duress" perpetrated upon him by Kelly Johnson, attorney, due to his intrinsic and overwhelming desire to truthfully testify to the Grand Jury and present to them evidence that would prove beyond a shadow of the doubt that in fact, Mr. Fiorini, was in fact NOT GUILTY of ANY WRONGDOING?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini planned to testify to the Grand Jury and present documentation that would prove his INNOCENCE on all counts, submitting documentation to the UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DISTRICT in reference to Case No. Cr.-1-03-068?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Important Evidence proving that Mr. Fiorini was Innocent were in the possession of attorney, Kelly Johnson, transported to the Court, for the purpose of information vital and necessary for the Grand Jury to be able to render proper judgment regarding Plaintiff's claims against the Defendant and not presented as evidence to the Grand Jury?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Documents serving as Evidence proving that Mr. Fiorini was in fact innocent were presented and accepted into hand by Mr. John M. DiPuccio#0021133, Assistant U.S. Attorney, who then reviewed said documents, then quickly stated that he did not want them, stormed into the courtroom empty handed and in four minutes plus seconds returned with an indictment against Mr. Fiorini?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that any reasonable person would have knowledge of the facts that it would be impossible for a forensic review and study of documents, truth and validated evidence to be studied by any jury or group of expert legal scholars and an indictment of counts handed down by any righteous and/or law abiding citizen of the Grand Jury or any United States Attorney?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that evidence known to an officer of the court is not to be withheld from the court and all parties involved?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the withholding of exculpatory evidence equates to an obstruction of justice?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini appeared in front of the Grand Jury for the expressed purpose of testifying under oath regarding any and all questions directed to him as he was subpoenaed to do?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that John M. DiPuccio, Assistant U.S.Attorney, refused to allow Mr. Fiorini to give testimony and refused to let Mr. Fiorini submit documents to the Court and/or the Grand Jury which would prove his INNOCENCE?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini, being denied a chance to present the truth to the Grand Jury, asked if the Grand jury would like to hear the truth?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini was again prevented from telling the truth to the Grand Jury and presenting validated evidence to the court which would prove that Mr. Fiorini was in fact innocent of the alleged allegations?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini OBJECTS to the Grand Jury handing down Indictment Counts 83-88 against him?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini OBJECTS to the Plaintiff's claim that he launched any type of unlawful car buying scheme?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini as President of GMNV Corp. entered into a simple contractual agreement with The Wellspring Capital Group INC. which as just one of their many products and/or services presented an automobile incentive program?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that at the time Mr. Fiorini, acting for GMNV Corp. was introduced to the Wellspring Capital Group INC. by his Pastor who himself had entered into contractual agreements with Wellspring Capital Group INC., was given true and accurate knowledge that Wellspring Capital Group INC. had an impeccable record of business administration and fulfillment of their contractual obligations which amounted to over twenty thousand plus contracts fulfilled and performed specifically?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. owns legally binding contractual agreements which specify monies owed to the GMNV Corp by Wellspring Capital Group INC?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Statements of Facts entered into the Court in reference to Wellspring Capital Group INC. proves that Wellspring Capital Group INC. had never defaulted on any of its contractual agreements with any of their over 22,500 customers and whom never had any complaint of any kind of non performance or breech of contract or complaint expressed to them by any of their twenty two thousand customers?

If no answer is forthcoming, the default answer is yes it is true

Isn't it true that any reasonable person doing their "due-diligence" would agree that an impeccable record of over **TWENTY TWO THOUSAND FIVE HUNDRED PLUS FULLFILLED CONTRACTS** is a **HIGHLY POSITIVE FINDING**?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a highly positive finding does not constitute recklessness?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. which is a lawful and legitimate corporation is permitted by law to enter into mutually binding agreements with other corporations that are deemed to be lawful?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. is in fact a legitimate lawful business and has never been proven not to be in any court of law?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that neither Mr. Fiorini nor GMNV Corp. had any knowledge that Wellspring Capital Group INC. was a potential future target by federal agencies who in fact misunderstand the capabilities of a positive successful modern day company utilizing new technology and an extremely low overhead for the positive purpose of helping those who contributed to the seed capital to prosper?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that neither Mr. Fiorini nor GMNV.Corp had any prior knowledge that legitimate assets of a legitimate company would be seized and held for the purpose of preventing a positive contractual agreement entered into between the lawful GMNV and the lawful Wellspring Capital Group INC. to be honored, preformed to and fulfilled for the purpose of fabricating evidence against GMNV and/or Fiorini that GMNV and/or

Fiorini has falsely misstated income owed to Fiorini and/or GMNV Corp. on a financial application which as a result of seizure by government agencies made it impossible to be honored in good faith or fulfilled by the mutually agreed parties through no fault of their own?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Fiorini is not responsible for any future potential wrongdoing of Wellspring Capital Group INC. simply because GMNV Corp. entered into a contractual agreement with Wellspring Capital Group INC. as "per business as usual"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group INC. is not responsible for any future potential wrongdoing of GMNV Corp. simply because Wellspring Capital Group INC. entered into a contractual agreement with GMNV Corp as "per business as usual"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that both GMNV Corp. and Wellspring Capital Group INC. mutually felt comfortable with each other as legal business entities before they entered into mutually binding contractual agreements which both companies intended to be fulfilled as specified?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that they generate a profit from their "products" and "services" which are derived from legitimate lawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that they are not a criminal organization?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that they are not a cult?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, states to the Court that they do not engage in criminal activities?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that it is not a criminal enterprise?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that it is not a criminal enterprise that in many ways mirrors a legitimate business?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that it is a legitimate lawful business that requires employees, equipment, and cash flow to operate?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that it is not a criminal enterprise or organization which generates its profits or gross proceeds from criminal or illegal activities?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that it is not a criminal enterprise requiring employees, equipment, and cash flow to operate?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that it is not a terrorist organization?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Court that it has no ties to any terrorist organization?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc. states to the Courts that it has never funded terrorists or their organizations?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater stated to the Court that he has no monies or properties connected with criminal or terrorist activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc has stated to the Court that it has no monies or properties connected with criminal activities or terrorist activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater stated that he has no incentive for illegal conduct?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater stated that he generates no profit out of crime?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no probable cause necessary to support a forfeiture action?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no probable cause necessary to support a summary forfeiture action?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no probable cause to support an administrative forfeiture?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no probable cause to support a judicial forfeiture?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no probable cause or burden of proof necessary to satisfy statutory requirements?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no burden of proof or probable cause necessary to satisfy constitutional requirements?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no burden of proof or probable cause met to satisfy both statutory and constitutional requirements?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true there is no probable cause for an administrative forfeiture as defined as a reasonable ground for belief of guilt, supported by less than prima facie proof, but more than mere suspicion?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no independent determination of merit by the U.S.A.'s office of probable cause or burden of proof to charge the property of violating the law?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no preponderance of the evidence to prove the property is subject to forfeiture?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no superior evidentiary weight that, though sufficient to free the mind wholly from all reasonable doubt, is still sufficient to incline a fair and impartial mind to one side of the issue rather than the other, rendering a decision that the truth is that Mr. Fiorini is Innocent of any and all allegations that have been made against him??

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater has stated that he has no monies or properties that are evidence of a crime or subject to forfeiture?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group, Inc has stated to the Court that it has no monies or properties that are evidence of a crime or subject to forfeiture?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the seizure of property owned or controlled by Blake Prater and/or Wellspring Capital Group, Inc violates guarantees provided in the Fourth and Fifth Amendments of The United States Constitution?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater has stated to the Court that he is not guilty of any criminal violation?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Wellspring Capital Group, Inc. has stated to the Court that it is not guilty of any criminal violation?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that the government has not met the legal standard of proof, beyond a reasonable doubt, necessary to convict the defendant in order to forfeit the property in a criminal forfeiture?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Wellspring Capital Group, Inc. has stated to the Court that it has no money or property that was illegally tainted?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that it has been stated to the court that there is no factual basis, reasonable grounds, probable cause or legal standard of proof, necessary to take action, or in persona action, against Blake Prater or Wellspring Capital Group, Inc.?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that it has been stated to the Court that there is no factual basis, reasonable grounds, probable cause or burden of proof necessary to create a civil forfeiture, or in rem action against the property of Blake Prater or Wellspring Capital Group, Inc.?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Blake Prater and/or Wellspring Capital Group, Inc. are not guilty of any Controlled Substances Act (CSA)?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Blake Prater and/or Wellspring Capital Group, Inc. are not guilty of any Money Laundering Control Act (MLCA)?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Blake Prater and/or Wellspring Capital Group, Inc. are not guilty of any Racketeer Influenced and Corrupt Organization Act (RICO)?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that there are no exigent circumstances justifying the government's seizure of property owned and or controlled by Blake Prater and/or Wellspring Capital Group Inc.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. know of no money or property that can be rightfully suspected of having "facilitated" a crime?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater is an "INNOCENT OWNER"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring Capital Group Inc. is an "INNOCENT OWNER"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that 21 U.S.C. sec.881(a) (7)&(6) states, "no property shall be forfeited...to the extent of an interest of the owner, by reason of any act or omission established by that owner to have been committed or omitted without the knowledge or consent of that owner."?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that 21 U.S.C.sec.881(a)(4)(c) states,("no conveyance shall be forfeited under this paragraph to the extent of an interest of an owner, by reason of any act or omission established by that owner to have been committed or omitted without the knowledge, consent, or willful blindness of the owner.")?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that parties can agree that they each have the right to enter into agreements per the United States Constitution Article 1, Section 10, and paragraph 1 where in it states, "NO STATE SHALL PASS ANY BILL OF ATTAINER EX POST FACTO LAW, OR LAW IMPARING THE OBLIGATION OF CONTRACTS."?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that it is lawful and just to permit Blake Prater and/or Wellspring Capital Group Inc. to fulfill his legal contractual obligations and contracts which were agreements entered into between the lawful Blake Prater and/or the lawful Wellspring Capital Group Inc. and his lawful clients?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. desire to fulfill the obligations of the signed legal contractual agreements entered into and agreed to by the consenting mutual parties, in accordance of The United States Constitution Article 1, section 10, Paragraph 1?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. issued bank checks with the intent that they would be honored in good faith as per their contractual banking agreement?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater is not motivated by greed or the material acquisition of goods?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not devised any scheme to defraud?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not intended any scheme to defraud?

If there is no answer forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not devised any artifice to defraud?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not intended any artifice to defraud?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not devised to obtain money or property for false or fraudulent pretenses?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not devised any scheme or artifice to obtain property or money by means of false or fraudulent pretenses or promises?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not caused to be transmitted any writings, signs, signals, pictures or sounds for the purpose of executing a scheme or artifice.

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not transmitted or caused to be transmitted by means of wire, radio, or television communications, in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose or intent of executing any scheme or artifice to defraud, or obtain money or property by means of false or fraudulent purposes?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Inc. have not obtained money or property by means of false or fraudulent pretenses, representations, or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, furnish or procure for any unlawful use or intent to defraud

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not executed, or attempted to execute or devised a scheme or artifice with the intent to defraud, or to obtain money or property by fraudulent pretenses, representations, promises, exchanges, distributions, supplying, furnishings, or procuring for unlawful use any counterfeit spurious coin, obligation, security or other article for the purpose of executing any scheme or artifice or intent to defraud

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not placed in any post office, authorized depository for mail matter, or any matter of thing whatever meant to be sent or delivered by the Postal Service or private or commercial interstate thing meant to devise, scheme, artifice or defraud, obtain money or property by false or fraudulent pretenses, representations or promises?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not received or caused or directed to be delivered any matter for the purpose of defrauding or obtaining any money or properties?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have performed no intentional misconduct?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and /or Wellspring Capital Group Inc. have performed no intentional misconduct?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and /or Wellspring Capital Group Inc. have no deliberate wrongdoings?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/ or Wellspring Capital Group Inc. have no deliberate recklessness?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have no conscience recklessness?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have no intent to cause damage?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have no actual knowledge of wrongful doing?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have no intentional dishonesty?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have no intentional knowledge of a fraudulent act?

If no answer forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have no conscience disregard?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that that Blake Prater and/or Wellspring Capital Group Inc. have no inference of recklessness either ordinary or service?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have no knowledge of any money or property involved in a financial transaction that represents proceeds from an unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not conducted any financial transactions involving proceeds from any unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not conducted any financial transaction involving proceeds from any unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not attempted to conduct any financial transactions involving proceeds from any unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have no knowledge of carrying on of an unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have no intent to promote or be associated with any illegal activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and /or Wellspring Capital Group Inc. have no knowledge or no knowledge of, any intent to conduct him in any type of action that would violate any Section of any of the Internal Revenue Code of 1986 such as section 7201 or 7206 or any other unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Inc. have not created or devised a transaction designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of any unlawful activity?

If no answer is forthcoming, the default answer is true.

Isn't it true that Blake Prater and/or Wellspring Capital Inc. have not devised in whole or in part to avoid any transaction-reporting requirement under State or Federal law?

If no answer is forthcoming, the default answer is true.

Isn't it true that Blake Prater and/or Wellspring Capital Inc. have not transported, transmitted, transferred, attempted to transfer, transfer, transport, or transmit a monetary instrument or fund from a place in the United States to or through a place outside the United States or to a place in the United States from or through a place outside the United States with the intent to promote the carrying on of any unlawful activity?

If no answer is forthcoming, the default answer is true.

Isn't it true that Blake Prater and/or Wellspring Capital Inc. have not transferred, transmitted, transferred or attempted the transfer, transport, or transmission of monetary funds from a place in the United States to a place outside the United States or a place outside of the United States to a place inside of the U.S. with knowledge of monetary instruments of funds involved to be the proceeds of any type of unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Inc. have not transferred, transmitted, transmitted, transported, or attempted to transfer, transmit, or transport a monetary instrument or funds from a place in the United States to or through a place outside of the United States for the purpose of disguising, concealing, the nature, location, source, ownership, or proceeds of any unlawful activity.

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. have not participated in any transfer, transport, transmit or attempt there of either in or out, or out or in, or through the United States or through or from a place outside of the United States for the purpose of avoiding the transactions reporting requirement under State or Federal Law or with the knowledge or intent of any monetary instruments or funds involved in the transportation, transmission, or transfer representing the proceeds of any specified unlawful activity.

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and or Wellspring Capital Inc. have knowledge that no law enforcement officer has established by proof, that Blake Prater and/or Wellspring Capital Group Inc. have any knowledge of any proceeds, of any specified unlawful activity used as monetary instruments or funds, involved in any transportation, transmission, or transfer, designed in whole or in part, for the purpose and intention to conceal or disguise, the nature, the location, the source, the ownership or the control of the proceeds of specified unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and Wellspring Capital Group Inc. have no law enforcement officers that have established with proof that Blake Prater and Wellspring Capital Group Inc. acted with intent to avoid any transaction – reporting requirement under State or Federal Law?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no other law enforcement officer has established by proof that Blake Prater, knew of monetary instruments or funds involved in transportation, transmission, or transfer, which represent proceeds from some form of unlawful activity

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater and/or Wellspring Capital Group Inc. did not have any contact with law enforcement officers who subsequently did not have any connections with knowledge or intent that Blake Prater acted with intent and knowledge for the purpose of carrying out any specified unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

No law enforcement officer knows of or has established by proof that Blake Prater acted with knowledge or intent of transfer, transmission, transport, of proceeds of any unlawful activity for the purpose of concealing, disguising, the location, the source, the ownership, or the control of proceeds of any unlawful activity or for the purpose of avoiding a transaction reporting requirement under State or Federal Law

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no law enforcement officer has established by proof that Blake Prater, knew of monetary instruments or funds involved in transportation, transmission or transfer, which represent proceeds from some form of unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no law enforcement officer has knowledge of any intent or knowing that Blake Prater acted with intent to promote the carrying on of specified unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no officer of the law knows of or has established by proof that Blake Prater acted with knowledge or intent of transfer, transmission, transport of proceeds, of any unlawful activity for the purpose of concealing, disguising, the location, the source, the ownership, or the control of proceeds of any unlawful activity or for the purpose of avoiding a transaction reporting requirement under State or Federal Law?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no law officer has heard subsequent statements from Blake Prater or observed any actions from Blake Prater that would lead any officer to have any knowledge or opinion that Prater believed that he did know of any funds, created from any unlawful activity, which were used in transfer, transmission, transport, from a place in the United States, to or through a place outside the United States, or to a place in the United States from any place outside the United States or to believe that Blake Prater had any knowledge or intent of carrying on or promoting any unlawful activity?.

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no law enforcement officer has heard any subsequent statements or observed or has knowledge of any actions, of Blake Prater, that would indicate that Blake Prater believes that he knew of any proceeds or funds, created from any unlawful activity or any type of transfer of illegal funds were knowingly or with intent, used to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of a specified unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no law enforcement officer has heard any subsequent statements from Blake Prater or actions of Prater that would indicate that Prater, had belief, knowledge or intent to avoid a transaction reporting requirement under State or Federal Law?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Blake Prater has not conspired to commit any offense involving the use of a financial institution, engaged in the activities, which affect interstate or foreign commerce in any way or degree?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has not conspired to commit any offense involving the movement of funds by wire or other means?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has not conspired to procure proceeds from any unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has not conspired to create any unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has not conducted or attempted to conduct a financial transaction with proceeds known to be from specified unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has not conducted or attempted to conduct a financial transaction with proceeds known to be from specified unlawful activity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has not conducted or attempted to conduct a financial transaction with proceeds known to be from specified unlawful activity with the intent to evade taxes?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has not transported or attempted to transport any monetary instruments or funds, to or from, the United States with the intent to promote or carry on a specified unlawful activity?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater has not conducted or attempted to conduct any financial transaction involving property a law enforcement officer represents to be the proceeds of specified unlawful activity or property used to conduct or facilitate specified unlawful activity with the intent to promote the carrying on of specified unlawful activity; to conceal or disguise the nature of the property believed to be the proceeds of specified unlawful activity; or to avoid a state or federal transaction reporting?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater has not structured any transaction to avoid reporting requirements under State or Federal Laws?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater has not engaged in, or had intent to, or knowingly engaged in, any monetary transaction involving property valued at more than \$10,000.00 that was derived from specified unlawful activity?

If no answer is forthcoming **the default answer is yes it is true.**

Isn't it true that Prater has not engaged in or conspired to engage in any type of "money laundering" act?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater has no knowledge of or intent to participate in any type of money laundering act with funds derived from specified unlawful activity or lawful activity?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater and/or Wellspring has not paid any subcontractor, cuts or fees, to participate in any type of money laundering act in violation of State or Federal Laws?

If no answer is forthcoming, **the default answer is yes it s true.**

Isn't it true that Prater and/or Wellspring have not constructed a "Ponzi" or an illegal "pyramid" type scheme?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not constructed any type of unlawful scheme with the intent to defraud anyone of anything?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have no connections with any type of illegal scheme?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has no connection with any illegal scheme which uses the mails and interstate wires?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not obtained property or monies derived from, traceable to, or constituting the proceeds of mail fraud, wire fraud, or money laundering?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not violated federal money laundering statutes, 18 U.S.C.-1956 or 1957?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have derived no proceeds from any illegal scheme?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not knowingly or with intent violated any criminal statutes?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not knowingly or with intent violated any State or Federal Laws?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not knowingly or with intent violated any Securities Laws?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not committed any offense of any kind which would substantiate the probability that the United States Government will prevail on the issue of forfeiture?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has no intent to destroy lawfully obtained property?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring pray to the Court that the hardships inflicted on all parties involved with the lawful activity known as Wellspring Capital Group Inc. now and in the near future, far outweigh the need of the court to preserve the availability of the property?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Wellspring offers real products, services and benefits which would be purchased and utilized regardless of there being an additional way earn money and is in no way a form of illegal pyramid or "Ponzi" scheme?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater affirms to the Court and all parties involved that the U.S Government and Economy will benefit by value brought forth by the legitimate Wellspring Capital Group Inc.

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not procured any monies or properties constituting, or derived from, proceeds obtained directly or indirectly as a result of violation of 1341, 1343, 1956, and 1957, of 18 U.S.C. as specified in Section 982 of U.S.C.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not conspired to violate section 1341, 1343, 1956, and 1957, of 18U.S.C?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater and/or Wellspring have not been convicted of violation or conspiracy to violate section 1341, 1343, 1956 or 1957 of U.S.C.?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater and/or Wellspring possess no property, real or personal, tangible or intangible, which is or was obtained directly or indirectly, as a result of such offense as a violation of 18 U.S.C. 1341, 1343, 1956 or 1957?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater and/or Wellspring possesses no property as a result of any offense, violation, mail fraud, wire fraud, money laundering, scheme, fraud, embezzlement, or any other unlawful activity?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater and /or Wellspring possesses no property or monies available for criminal forfeitures designed to capture properties constituting or derived from criminal violations directly or indirectly as specified in U.S.C 982?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater and/ or Wellspring have not committed or conspired for the purpose of executing or attempting to execute any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent statements, pretenses, representations, or promises?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that all gross receipts, relating to accounts held in connection with Prater and /or Wellspring, were obtained through lawful activity and are not in violation of any statute therefore are not qualified for forfeiture capturing?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Prater and/or Wellspring have not engaged in or conspired to engage in any unlawful telemarketing as defined in 18 U.S.C. Section 2325?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that the assets that were seized from Prater and/or Wellspring were legitimate assets belonging to a legitimate business?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the property and monies involved that were seized from Prater and or Wellspring were not derived from, traceable to, or constituting the proceeds of mail fraud, wire fraud, or money laundering or any other unlawful activity and need to be returned and restored to Prater and/or Wellspring?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and or Wellspring have not committed any crime or private or public wrong doing with intent or by negligence, against persons or their property?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's Complaint against Blake A. Prater and Wellspring Capital Group, Inc?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's Summary?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's claim of Jurisdiction?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's Statement of Facts?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "The Offerings"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "The car DEAL Payment" Plan?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "The Rent Relief" Plan?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "The Business Expense Replacement" Plan?

If no answer is forthcoming, the default answer is yes this is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "The Payroll Replacement Plan"?

If no answer is forthcoming, the default answer is yes this is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "The MPact Program"?

If no answer is forthcoming, the default answer is yes this is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "The Right-to-Receive" Agreements?

If no answer is forthcoming, the default answer is yes this is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "The MPACTFUND"?

If no answer is forthcoming, the default answer is yes this is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "Material Misrepresentations Regarding the Investor Funds"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "Material Misrepresentations by Prater about His Own Background"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "FIRST CLAIM FOR RELIEF AGAINST PRATER AND WELLSPRING"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "Offer and Sale of Unregistered Securities Violation of Sections 5(a) and 5(c) of the Securities Act"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "SECOND CLAIM FOR RELIEF AGAINST PRATER AND WELLSPRING"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "Fraud in the Offer and Sale of Securities Violation of Section 17(a) of the Securities Act"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "THIRD CLAIM FOR RELIEF AGAINST PRATER AND WELLSPRING"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "Fraud in Connection with the Purchase and Sale of Securities Violation of Section 10(b) of the Exchange Act and Rule 10b-5"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "FOURTH CLAIM FOR RELIEF AGAINST PRATER AND WELLSPRING"?

If no answer is forthcoming, the default answer is yes this is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "Civil Monetary Penalties Section If 20(d) of the Securities Act and Section 21(d) (3) of the Exchange Act"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "DEFENDANTS"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "RELATED ENTITIES"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater OBJECTS to the Plaintiff's, "WEBSITES"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Plaintiff's comparison of Prater and/or Wellspring to Devours is inapposite?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater is not an embezzler, with or without exhausted funds, has not stolen funds, and is not guilty of acts of fraud or deceit?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring did not endanger by fraud, any money?

If no answer is forthcoming, the default answer is yes it is true?

Isn't it true that Prater did not endanger by fraud, any victims money, place any property at risk, place any property of innocent victims at risk, or participate in any criminal activities?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater did not create any intended victim, create any intended loss, place any money or property at risk by misappropriating and is not the author of an unlawful scheme with or without intentions that anyone might loose anything?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater, did not impose a loss on his employer, is not an embezzler with intent to impose a loss on his employer, and is not an embezzler with intent to use the money to gamble and win and thus be able to replace every penny he had taken?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater is not an embezzler who is simply caught before he had a chance to gamble with any of the money and therefore every cent can be recovered?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater is not an embezzler no matter how golden his intentions or how happy the consequences?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater is not a swindler, and was not cheating or defrauding individuals of money or property as written in the definition of swindler?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater is not a swindler, not a swindler who actually pays large returns, not a swindler who actually pays the promised return on the initial investment for the purpose of attracting additional investors, or a swindler who makes payments solely from the corpus of new investments?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater is not a swindler, not a swindler with intent or desire to abscond, not a swindler who takes an appropriate time to abscond with the outstanding investments, and has not represented any profits to promote any unlawful scheme?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has not sent or received any wire transfers for the purpose of promoting any type of unlawful scheme and is not guilty of wire fraud, aiding and abetting, or committing any crime or wrongdoing that occasioned a loss of any kind?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater did not sign fraudulent receipt-of-funds letters on behalf of an Investment Brokerage Firm, did not violate S.E.C. Regulations, and did not sign "receipt-of-funds" letters that he was not authorized to do?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater did not open a bank account for the purpose of misleading foreign investors to wire monies into an account that they thought would be backed by a major Investment Brokerage?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Reed's Law proves the creation of new wealth and value through gateway partnerships among net communities of value?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that that Prater is not an unlawful schemer who initially risks every penny with no guarantee of any return?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have incorporated sufficient anti-saturation policies?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring Capital Group Inc. have employed ethical business practices and have a solid history of honoring on time all of their contractual commitments?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there exists no evidence of public wrong committed by Prater and/or Wellspring which would provide the degree of proof, or burden of proof, necessary and beyond a reasonable doubt, necessary for a criminal conviction?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there exists no evidence of private wrong committed by Prater which would provide the degree of proof, or preponderance of evidence, necessary for a civil suit against Prater to be successful?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there exists no evidence against Prater that would be necessary for a criminal prosecution requiring proof of guilt beyond a reasonable doubt, to be successful?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true there is no factual basis, probable cause, or reasonable grounds to believe that Prater committed any tort or crime?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no factual basis, probable cause, or reasonable grounds to believe that Prater committed any crime against: a person, the general public, the home, or other property?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no factual basis, probable cause, or reasonable grounds to believe that Prater committed any crime, which must include a criminal act (actus reus) and criminal intent (mens rea)?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the fundamental premise of our criminal justice system is that it is "far worse to convict one innocent person than to let many guilty people go free"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater has been violated under guarantees provided in The Fourth Amendment, which protects against unreasonable searches, which also require probable cause?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no probable cause, factual basis, or reasonable grounds to case law exceptions relating to search warrants requirements such as: "hot pursuit" of a suspect, evidence in plain view or about to be destroyed, searches of arrested persons, and good faith police behavior, that apply to Prater and/or Wellspring.

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring have not committed any statutory offenses or crimes per se, with the mens rea requirement presumed or eliminated?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring are victims of intentional torts and negligence, causing him suffered harm and damages?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring are victims of criminal fraud and deceit, serving the purpose of depriving him of his property and other rights?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Prater and/or Wellspring are victims of negligence torts consisting of duty, breach, causation, and damages?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. executed contractual agreements with Wellspring Capital Group INC. with a complete belief that Wellspring Capital Group INC. was a lawful legitimate corporation?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that in The United States of America a business person who wishes to conduct business is not required to be licensed as a Professional Securities Broker-Dealer?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that in The United States of America a business professional is not required to be licensed as a Securities Broker- Dealer?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that in The United States of America a business professional that as part of their ethical business practices regularly enters into contractual relationships and contractual agreements is not required to be licensed and registered as a Securities Broker-Dealer?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that the products marketed by the Defendant do not constitute and are not implied or meant to be in any way a "legal offering" as defined by law or statute?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that products offered by the Defendant do not constitute any form of unlawful, unlicensed money-services business?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that the products marketed by the Defendant are not described as an offering as described by The Securities Exchange Commission per rules and requirements for registration?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that the Internet markets and promotes activities of lawful business entities?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that the Marketing capabilities that fuel the Internet are the result of works recognized as The Nobel Prize winner in Economics?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that research proved that Three Hundred Billion Dollars per annum have been placed into start up businesses in America by "unknowns" who contribute for the purpose of receiving a greater potential return than they would ever receive from any banking or insurance type investment, stock or mutual fund risk?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that research is documented that business start ups do no rely on conventional banking type financing?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that research documents that business start ups do not rely on traditional venture capital?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no individuals involved in the legally contractual agreements with the Defendant have lost any monies as a result of business as usual obligations always made in good faith?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Defendant's contractual agreements with clients have in no way violated any banking regulations?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that various individuals and corporations affiliated with the Defendant are not required to be registered in States where they do not deal in licensed securities?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that actions taken by the Plaintiff to shut down the legitimate business owned and operated by the Defendant was in violation of the law?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Defendant had no intent, word, deed or action to shut down and default in his commitments?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that The President of The United States has expressed his goal and desire to make people self sufficient and self sustaining?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no person, entity, or corporation has been made a victim by actions intended, inflicted or perpetrated by actions of the Defendant?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no person, entity or corporation has been a victim of intentional fraud perpetrated by the Defendant?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that no person, entity, or corporation has been a victim of "too great of a return"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no definition legal or otherwise defining "what is too great"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that there is no definition or opinion of "exorbitant" and what or why or how one might factor the fact of the matter, that one might receive a better return for one action versus another's return for a dissimilar or similar action?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that traditional money lenders and controllers do not want the public to be educated in the value of the "magic of compound interest"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the rule of 72 is purposely not taught to students for the purpose of defrauding them of their potential for financial accomplishment?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the rule of 72 is purposely not taught to students for the sole benefit of traditional lending institutions?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that if persons understood the simple mathematical formula that would enable them an opportunity to achieve financial fulfillment through personal actions and contractual agreements that they entered into themselves, rather than lending every penny to traditional financial establishments and accepting a loosing return coupled with cost of living inflation, that they would do so if educated to the proven financial and mathematical equations that would enhance their quality of life, enter into such contractual agreements?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that traditional lenders such as banking and insurance companies, well known as the richest entities in the world, do not want the general public to have the knowledge necessary to achieve gains for ones' self through contracts paying a superior return, because if the public acquired such knowledge they would never blindly lend their hard earned money to the traditional lenders who would themselves reap "exorbitant" sums and pay peanuts(even if lucky) in return to their "investors"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Defendant's Mission Statement and Goals were to improve Quality of Life through an improved return?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Defendant did not violate his contractual agreements during business as usual prior to and before Defendant was personally violated by the Plaintiff?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Banking Community does not want the public to be knowledgeable regarding the subject of accumulating wealth?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Insurance Companies do not want any individual members of the general public to have the financial knowledge that has created their massive wealth?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that books, articles and documents have been written that expose the Securities Exchange Commission (S.E.C.) for operating illegal schemes to defraud the general public in connection with registering said Mutual Fund Families?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that books, articles and documents state that the Plaintiff is involved in illegal schemes and artifices to defraud known to the general public as loopholes written within the Social Security System?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Commission was erroneous in their actions of shutting down said lawful related operations concurring with Defendant's principal position of business?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that it is well documented that the Securities and Exchange Commission historically has shut down and seized entities that were in fact successful and making monies for the sole intent of seizing their assets, scrutinizing their abilities, talents and methodologies in order to STEAL their ideas, companies and assets for themselves?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Internet Service providers may conduct business with lawful contractual companies who provide through agreements, products and services which then provide lawful product, services and benefits marketed over the internet?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Commissioner of the Dept. of Banking, Insurance, Securities, and Health Care Administration has acted erroneously in their efforts to not halt securities and banking violations accusing the lawful and legitimate business entities of the Defendant?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Commissioner of The Dept. of Banking, Insurance, Securities and Health Care Administration should not have taken "quick action" in shutting down and perpetrating the seizures of a legitimate, lawful and viable business which was creating a positive impact on job creation and The United States Economy?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the State Department of Commerce, Division of Securities ("Division") regulates the securities industry within a given state and has no jurisdiction over contractual agreements entered into between mutually consenting parties?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the "Division" reviews the activities of those persons and firms who offer or sell securities, including those who issue them and in that regard, have no jurisdiction over individuals or entities that simply enter into mutual contractual agreements with mutually consenting parties?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that said member of any mutually consenting agreement to any legal and binding mutually consenting contract is in no way said to be participating in a legal offering that is bound and governed by The Securities and Exchange Commission (S.E.C.)?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that any and all presentations, advertisements and/or marketing represented to any person by any person, granting truth in fact that they delivered said presentation in truth and fact as per documented contractual agreement, contracted between legal consenting adults who chose of their free will to enter into said agreements for the purpose of helping others obtain a higher quality of life, obtained through the magic of compound interest, education, digital technology, and a massive improvement in aggressive reduction of business overhead expenses?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that parties who have entered into mutual agreeing contractual agreements as per The United States Constitution have the right to enter into mutual contracts on their own free will without being persuaded to "invest?"

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that parties may enter into a mutual agreement without subjection to inference from The Securities and Exchange Commission that they were persuaded to invest in a contract that is not considered an investment under the Commission laws and/ or subjected to repeated harassment from Government agencies?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that parties may enter into a mutual contractual agreement with contractual consideration without entering into a S.E.C. specified "offering"?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that parties may enter into contracts without being subject to harassment by The Government who in fact is prematurely without knowledge of specific legal facts such as consideration involved in a given lawful contract and monies exchanged in said given contract versus Security Regulated Offerings which are governed by reason by the Securities and Exchange Commission and require investments?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that parties can agree to enter into mutually consenting agreements per The United States Constitution Article 1. Section 10, 1, "No State shall pass any bill of attainder ex post facto law, or law impairing the obligation of contracts."? Harassment and interrogations of contracts in reference to the mutual agreements between Defendant and parties are hereby objected too!

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that The Defendant objects to Plaintiff's harassment and interrogatories in reference to the questioning of persons and/or entities related to Defendant in respect to inference that Defendant negotiated unopposed legal offerings, necessary to be regulated under the laws and regulations of the Securities and Exchange Commission rather than specify details of the clean cut contractual agreements that truly existed between Defendant and mutually consenting parties?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Fiorini has requested in writing to be presented with the document indicting him on counts 83-88 and has never been shown the document, had it faxed to him or served upon him.

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. is a legitimate Nevada corporation?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. was formed and incorporated June 19, 2001?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the GMNV Corp. has an Employer Identification Number 31-1783611?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. was structured and set up by Corporation Makers Inc.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. was developed by Corporation Makers Inc. which is a legitimate company that specializes in the formation of businesses and corporations?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Corporation Makers Inc. is located at 1900 Sierra Oaks, Las Vegas Nevada, 89134?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Corporation Makers Inc. authorized the Articles of Incorporation for The GMNV Corp. on June 19, 2001?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Corporation Makers Inc. filed The Articles of Incorporation for The GMNV Corp. with the Secretary of State, Dean Heller, 101 North Carson St. Suite 3, Carson City, Nevada 89701 (775) 684- 5708?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. is an active corporation?

If no answer is forthcoming, the default answer is yes it is true.

.Isn't it true that GMNV Corp. is a legitimate active corporation renewable again on June 19, 2004?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Corporation Makers Inc. was founded by Joel Schnur, Principal, who has 30+ years of experience?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Nevada offers more advantages to corporations than other states?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation does not share information with the IRS or other outside agencies?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation's annual fees are among the lowest?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation's privacy is to be respected?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Stockholders, Directors, and Officers, disclosures, can be blocked from public access?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation is not required to hold meetings and activities in the State of Nevada?

If no answer is forthcoming, the default answer is yes it is true

Isn't it true that Owners, Officers and Directors of a Nevada Corporation are protected from personal liability?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Nevada does not tax the income of corporations or individuals?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Directors of a Nevada Corporation do not have to be stockholders?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation can hold, purchase, transfer or sell its own stock?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation is virtually free to engage in any legal activity including issuing of stock for property, land, leases, services, etc.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the State of Nevada is friendly to businesses and minimizes taxes, regulations, and oversight of the corporate entity?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. is established in accordance with The Nevada Statues?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. was properly established in accordance with its specific needs?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corp. does not require its owners to have residence in Nevada or for that matter, The United States?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corp. allows Owners to come and go, live and die, but the corporation lives on as long as it meets the requirements of the State?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corp. allows Owners, Officers and Directors to be protected from the liabilities of the corporation?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that all liabilities remain the corporation's responsibility when a corporation is incorporated in the State of Nevada?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada corporation specifies that the Directors, Owners, and Officers will not be faced with lawsuits or seizures of personal assets resulting from the corporation's activities?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Nevada is an avid pro-business state as such; corporations and individuals do not incur state income taxes?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Nevada offers an umbrella of privacy and resists any attempts to exchange information with outside agencies, including the I.R.S?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Nevada is the only state that offers the extent of respect and privacy of business which is why so many celebrities and notable individuals incorporate in Nevada?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada corporation allows one person to hold all offices?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation specifies that the same individual may be President, Treasurer, Secretary and Director?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation only requires one Director?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation does not require notification of intervening changes?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada corporation allows for operation of the corporation from a personal residence?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that a Nevada Corporation allows for personal assets to be given, loaned, or rented to the Nevada Corporation?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that George Fiorini made personal loans to the GMNV Corp. a Nevada corporation?

If no answer is forthcoming, the default answer is yes it is true?

Isn't it true that the loans made to the GMNV Corp. from George Fiorini were derived from lawfully obtained funds?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that George Fiorini lawfully made loans to the legitimate GMNV Corp.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. is a lawfully abiding corporation?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that loans made to the GMNV Corp. from Vicki G. Fiorini were derived from lawfully obtained funds?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that all assets belonging to the GMNV. Corp was obtained with lawfully obtained funds?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. entered into a lawfully binding contractual agreement with Wellspring Capital Group, INC.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. had knowledge that Wellspring Capital Group, INC. intended to honor the contractual agreements?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. had knowledge that Wellspring Capital Group, INC. had a history of 100% performance on their contracts?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. had knowledge that Wellspring Capital Group, INC. had preformed specifically on over 22,500 (TWENTY TWO THOUSAND FIVE HUNDRED) contractual agreements?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. had knowledge that Wellspring Capital Group INC. had a history of never receiving even a single complaint?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. had every reason to believe that Wellspring Capital Group INC. would perform specifically per their mutual lawful contractual agreements?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. was introduced to Wellspring Capital Group INC. by his pastor and friend, Reverend Tim Cummings of New Creation Christian Center, who himself held contractual agreements with Wellspring Capital Group INC?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that New Creation Christian Center is located on a parcel of property that bridges the State line between Ohio and Indiana?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Reverend Tim Cummings introduced GMNV Corp. to Phil Smith, who prepared the contractual agreements between Wellspring Capital Group, INC. and GMNV Corp?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Phil Smith questioned GMNV Corp. as to their preference of banking relationships?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Phil Smith questioned GMNV Corp. about the potential of banking with U.S. BANK?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini responded that he had prior positive banking relationships with U.S. BANK?

If no answer is forthcoming, the default answer is yes it is true

Isn't it true that Phil Smith then suggested that a U.S. Bank was right down the street?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Phil Smith stood up and pointed out the window towards the U.S.Bank? ,

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini could see the Red, White and Blue, U.S.Bank Sign?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Phil Smith directed Mr. Fiorini to go to the U.S.BANK and open an account for the purpose of executing the contractual agreements between GMNV Corp. and Wellspring Capital Group?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini opened an account with U.S. BANK on July 22, 2003 for GMNV Corp. for the purpose of executing the contractual agreements between GMNV Corp. and Wellspring Capital Group?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini returned to the office at the New Creations Christian Center, where Phil Smith and Reverend Tim Cummings were waiting for his return from U.S. Bank?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini then handed the consideration payment to Phil Smith for the purpose of executing the contractual agreements between GMNV Corp. and Wellspring Capital Group INC.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini committed no wrong doing by opening an account for GMNV Corp. with U.S.BANK?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Phil Smith suggested that Mr. Fiorini introduce himself to Tom Shiverdecker, at The Studebaker, Buick-Pontiac GMC, INC. Car Dealership while he was in the neighborhood?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Studebaker Dealership was right down the street from the U.S.BANK?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Phil Smith suggested that Mr. Fiorini meet with Tom Shiverdecker because Tom had many customers who had entered into contractual agreements with Wellspring Capital Group INC?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini went to the dealership and introduced himself to Tom Shiverdecker?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Tom Shiverdecker shared details relating to the many satisfied customers, including his personal secretary, who have entered into contractual agreements with Wellspring Capital Group INC?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that The Studebaker Dealership sold many automobiles to customers who were using contractual agreements with Wellspring Capital Group,INC. to make their car payments?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini felt very comfortable about his decision to enter into contractual agreements with Wellspring Capital Group INC. as a result of his conversation with Tom Shiverdecker?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini felt very comfortable about The Studebaker Dealership and Tom Shiverdecker that he told his family and friends about the positive experience he had encountered?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Fiorini was contacted by his friend and client, Doris Ring, who wished to purchase Coral Calcium from Mr. Fiorini?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring had read in The Cincinnati Enquirer that Mr. Fiorini was a supplier of Coral Calcium?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring requested Mr. Fiorini to send her the label on the bottle so that she could present it to her Doctor for his approval?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini immediately honored her request and sent her the label which listed all ingredients?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring called Mr. Fiorini back to request an order of Coral Calcium?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini honored her request?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini asked Doris Ring if she knew of anyone who was in the market for a new or used car, since he was very excited about the information he had just learned from The Studebaker Dealership?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring replied that she, herself, was indeed in need of a new or used car?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini shared with Doris Ring the information that he had discovered?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring wanted to complete an application for a preliminary loan approval?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the application that Doris Ring submitted was approved by the lender?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini offered to drive Doris Ring personally to the Studebaker Dealership and introduce her to Tom Shiverdecker?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini took his Mother, Anna Fiorini, along with Doris Ring, to the Studebaker Dealership?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini's Mother, Anna Fiorini, purchased a car from Tom Shiverdecker and the Studebaker Dealership that day?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring purchased a car from Tom Shiverdecker and the Studebaker Dealership that day?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring purchased her car, 100% on her own free will?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring purchased her new car through her personally submitted financial statements, per application and personal signature for her loan application, submitted to the Dealership, GMAC, and/or the lending institution?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring was elated over the purchase of her new Buick?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring was desperate to rid herself of her older dilapidated vehicle which had multiple mechanical problems as well as dysfunctional windows, dysfunctional air conditioning, and a less than aesthetic appearance?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring told Mr. Fiorini that she was thrilled to get rid of the car for \$500?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the purchase of Doris Ring's car had absolutely nothing to do with Mr. Fiorini?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini has never entered into a contractual agreement regarding the purchase of an automobile with Doris Ring?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini has entered into contractual agreements with Doris Ring, in the past which have been satisfied in whole?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini has received a personal loan from Doris Ring that Mr. Fiorini has made efforts to the best of his ability to fulfill?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring has acknowledged Mr. Fiorini's efforts to fulfill his obligation under the circumstances?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring and Mr. Fiorini committed no wrongdoing by entering into an agreement with each other?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Anna Fiorini is happy with the automobile that she purchased from the Studebaker Dealership?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Doris Ring bought her car herself and Mr. Fiorini did not buy a car for Doris Ring?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that The Studebaker Dealership gave rebate funds back to Doris Ring?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that it was a regular practice of Car Dealerships to offer incentives such as cash rebates to promote the sale of their automobiles?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Doris Ring financed her car's sales tax obligation with the lending institution so that she would not have to produce additional out of pocket monies?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Anna Fiorini financed her car's sales tax obligation with the lending institution so that she would not have to produce additional out of pocket monies?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that financing a car's sales tax obligation with the lending institution is a common business practice amongst car dealerships?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Tom Shiverdecker recommended to Anna Fiorini and Doris Ring that financing their sales tax obligation would save them out of pocket expenses?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Anna Fiorini and Doris Ring both responded that yes indeed they would like to finance their sales tax rather than come up with additional down payment(out of pocket expenses)?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Anna Fiorini and Doris Ring executed their car purchases at the same table, simultaneously with Tom Shiverdecker?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Anna Fiorini and Doris Ring entered into their contractual agreements with The Studebaker Dealership for the purpose of purchasing their automobiles and both received checks back for the tax obligation that they had financed and for the manufacturers rebate that was offered as an incentive to purchase?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini was excited that his Mother, Anna Fiorini and Doris Ring were able to purchase safe and reliable transportation without major out of pocket expenses?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the automobiles purchased by Anna Fiorini and Doris Ring would be ready for delivery at a mutually agreeable time?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini made arrangements to have the cars delivered for his Mother and Doris Ring?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini made a call to Mr. Phil Smith, while at the Studebaker Dealership to tell him that he was in the neighborhood and that Tom Shiverdecker had suggested that he be contacted in order to see if he could come to the dealership and meet the two ladies who have an interest of entering into an agreement with The Wellspring Capital Group INC. for the purpose of having their payments subsidized which would further decrease their out of pocket expenses?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini introduced his Mother and Doris Ring to Mr. Phil Smith who patiently outlined details regarding The Wellspring Capital Group INC and its benefits?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Anna Fiorini and Doris Ring were anxious to hear details about The Wellspring Capital Group INC. and Wellspring's contractual agreements that assist in the repayment of car loans?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Anna Fiorini and Doris Ring were aware of the details regarding contractual agreements and benefits offered by Wellspring Capital Group INC. that had been shared with them by Mr. Fiorini?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Anna Fiorini made a decision that she wanted to enter into a contractual agreement providing the benefits offered by Wellspring Capital Group INC.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring made a decision that she wanted to enter into a contractual agreement providing the benefits offered by Wellspring Capital Group INC.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. had a lawful contractual agreement with Wellspring Capital Group INC?

If no answer is forthcoming, the default answer is yes it is true>

Isn't it true that Mr. Phil Smith, acting as a representative of The Wellspring Capital Group INC., was authorized to do business with and except checks from the GMNV Corp.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the GMNV Corp. was already pre qualified to do business with Wellspring Capital Group INC?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Anna Fiorini and Doris Ring endorsed their rebate checks over to the GMNV Corp. who in turn wrote out a check to The Wellspring Capital Group INC. for the purpose of Anna Fiorini and Doris Ring to receive the benefits offered by Wellspring Capital Group INC. that they had requested?

If no answer is forthcoming, the default answer is yes it is true.

Isn't true that the GMNV Corp. then completed the necessary documents to enter into contractual agreements with The Wellspring Capital Group INC. with their representative, Mr. Phil Smith, for the purpose of providing benefits to Anna Fiorini and Doris Ring?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that the Studebaker Dealership stated that they would detail the cars in preparation for delivery?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini personally took his time to educate Doris Ring about the features of her new Buick Century, upon delivery and ride with her around the neighborhood until Doris Ring became comfortable with the controls of her new car?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that at the Studebaker Dealership, Doris Ring had only sat in the car and had not taken it for a test drive so Mr. Fiorini insisted that she become familiar with the new car and its options before letting her drive on her own?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini's wife accompanied them on the test drive?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini and Doris Ring shared conversation regarding when the car payments would be owed?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini expressed to Doris Ring that it was his understanding that her first car payment would be due around the middle of September, 2003?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini expressed to Doris Ring that funds coming to the GMNV Corp. from the contractual agreement entered into between Wellspring Capital Group INC. and GMNV. Corp on her behalf, would not be expected to begin until some time around the middle of October, 2003?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini told Doris Ring that he would personally cover her first car payment for her?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring asked and re-asked Mr. Fiorini to accept money and/or reimbursement for his gasoline expenses consumed by his delivery of her new car?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring and Mr. and Mrs. Fiorini exchanged Hugs, upon leaving the new car with Doris Ring?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini did in fact cover Doris Ring's first car payment for her?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring thanked Mr. Fiorini and was very grateful to Mr. Fiorini for his willingness to pay her initial car payment that was due in September, 2003?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring contacted Mr. Fiorini about the fact that her 30 day tag from the dealership was to expire September, 17, 2003?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini responded that he would contact Tom Shiverdecker at the Studebaker Dealership to remind him that he had stated to the ladies that he would send them an updated tag if a few extra days were needed to create the time necessary for Wellspring Capital Group INC. to process their contractual agreements?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Tom Shiverdecker stated that he would be happy to send them out, no problem?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini then contacted Doris Ring and let her know about the positive customer service that The Studebaker Dealership practiced and that the extended tags would be sent directly to her?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring did not receive the extended tags from the dealership?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring contacted The Studebaker Dealership, per Tom Shiverdecker, directly when she did not receive her temporary tag and let him know that she had not yet received it?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Tom Shiverdecker replied to Doris Ring that her tags had been mistakenly sent to the wrong address, had been returned to the Dealership and that he would resend them to her?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring then contacted Mr. Fiorini to share Tom Shiverdecker's response about the misdirected tags and to express her concern about the fact that her current tags were now expired?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini suggested that it was a common practice that when an individual sells a prior car that they were legally allowed to use the old car's tag for 31 days while making their transition of registration?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini then confirmed that a solution to the immediate problem that Doris Ring was confronting with Mr. Shiverdecker who affirmed that, yes using the old plates for a 31 day time period was a common practice and a good idea for Doris Ring?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini then offered to go to Doris Ring's home and personally put on the old car's tags on the new car?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring thanked Mr. Fiorini for his offer but stated that she had a neighbor who she was able to ask for help?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring called Mr. Fiorini on October 8, 2003, concerned about her second car payment that was to be coming due and her sales tax payment that was rebated to her and would be coming due as well?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini replied, that as they had previously discussed together, The Wellspring Capital Group INC. was not expected to have sent funds designated for her behalf to GMNV Corp. until the middle of October or so?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring was more concerned with the possibility of her old tags expiring that were currently placed on her new car?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini, whose relationship with Doris Ring is like that of a Mother and Son, did not want her to be concerned and therefore Mr. Fiorini sent her monies to make her second car payment as well as monies to transfer her tags?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring cashed the checks from George J. Fiorini and Vicki G. Fiorini's personal checking account with PNC BANK that were sent to her for the purpose of easing her mind?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring, in turn, wrote a check to her lending institution for the purpose of covering her obligation to them?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Doris Ring went to the Ohio State License Bureau of Motor Vehicles, (BMV), and satisfied her obligations with the Ohio DMV?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini was concerned about the physical health of Doris Ring because she had not called to thank him and Vickie for their help as was her normal pattern?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Mr. Fiorini discovered on October 16, 2003 that Doris Ring had been contacted by Government Agents who frightened her and asked her not to talk to Mr. Fiorini?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Mr. Fiorini was advised by his attorney, Kelly Johnson, that he was not to call his friend Doris Ring?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Mr. Fiorini was upset with this order as he desired to update her to the status of Wellspring Capital Group INC.?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that GMNV Corp. is owed monies from Wellspring Capital Group INC.?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Wellspring Capital Group INC. is desirous of fulfilling their contractual agreements with GMNV Corp. and paying them the monies owed to them?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that GMNV Corp. had told Doris Ring that when the Wellspring Capital Group INC. was able to perform on their contractual obligations to GMNV. Corp. that at that time GMNV Corp. and Doris Ring would be able to enter into a contractual agreement for the purpose of covering her payments for the new car that she had purchased from The Studebaker Dealership?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that GMNV Corp. and Doris Ring were never able to enter into a contractual agreement with each other because Wellspring Capital Group INC. has not been able to perform on their contractual agreements with the GMNV Corp. due to circumstances that are not the fault of either Wellspring Capital Group INC. or GMNV Corp.?

If no answer is forthcoming, **the default answer is yes it is true.**

Isn't it true that Doris Ring understood that GMNV Corp. would not be able to enter into a contract with her for the purpose of covering her car payments until Wellspring Capital Group INC. was able to perform on their contractual agreements with GMNV Corp.?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. is still waiting for the Wellspring Capital Group INC. to be able to complete their contractual agreements with GMNV Corp. which at that time GMNV Corp. would enter into an agreement with Doris Ring, as they had verbally discussed their intentions to, when they were able to?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that Mr. Fiorini has no oral, written or implied contractual agreement with Doris Ring to make her car payments for her?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. has no oral, written or implied contractual agreement with Doris Ring to make her car payments for her?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. made a payment to Doris Ring of \$494.00 in September, 2003, which was to be deducted from the balance of a prior loan commitment?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. has never made any false statements on any loan application?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. has never made any false statements?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. listed income on a loan application of \$160,000.00 which is a true statement?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. had contractual agreements with Wellspring Capital Group INC. that alone was to pay GMNV Corp. \$5000.00 per week for forty-three weeks?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp. was highly conservative in their estimate regarding their income on the loan application made to GMAC through the Studebaker Dealership?

If no answer is forthcoming, the default answer is yes it is true.

Isn't it true that GMNV Corp has committed no wrongdoing?

If no answer is forthcoming, the default answer is yes it is true?

I George J. Fiorini II am not an expert in the law however I do know right from wrong. If there is any human being damaged by any statements herein, if he will inform me by facts, I will sincerely make every effort to amend my ways. I hereby and herein reserve the right to amend and make amendment to this document as necessary in order that the truth may be ascertained and proceedings justly determined. If the parties given notice by means of this document have information that would controvert and overcome this Affidavit, please advise me IN WRITTEN AFFIDAVIT FORM within two(2) days from receipt hereof, (Time being of the Essence due to the scheduled preliminary hearing which is set for November 12, 2003) providing me with your counter affidavit, proving with particularity by stating all requisite actual evidentiary fact and all requisite actual law, and not merely the ultimate facts or conclusions of law, that this Affidavit Statement is substantially and materially false sufficiently to change materially my status and factual declarations. Your silence stands as consent to, and tacit approval of, the factual declarations herein being established as fact as a matter of law. May the will of our Heavenly Father, through the power and authority of the blood of his son be done on Earth as it is in Heaven.

BE IT ACKNOWLEDGED, that George J. Fiorini, II, the Undersigned deponent, being of legal age does hereby depose and say under oath as follows (or as set forth on the signed addendum annexed and incorporated herein):

Witness my hand under the penalties of perjury this ninth day of November, 2003.

State of Ohio

County of Hamilton



Then personally appeared

Who acknowledged the foregoing, before me.

Melanie S. Thompson
Notary Public

My Commission Expires: June 16, 2004